



U.S. Department of Justice

United States Attorney
 Southern District of New York

The Silvio J. Mollo Building
 One Saint Andrew's Plaza
 New York, New York 10007

February 12, 2019

Via ECF

The Honorable Paul A. Crotty
 United States District Judge
 Southern District of New York
 United States Courthouse
 500 Pearl Street, Courtroom 14C
 New York, New York 10007

Re: *United States v. Joshua Adam Schulte, S2 17 Cr. 548 (PAC)*

Dear Judge Crotty:

The Government writes to update the Court concerning two of the discovery issues raised at the conference on February 5, 2019.

First, with respect to the defendant's access to discovery in prison, the Government has consulted with the MCC and understands that the hard drives containing the defendant's discovery were misplaced. As a result, the Government is providing another copy of the discovery to the defendant, which will be produced by tomorrow. In consultation with defense counsel, this reproduction will include all of the unclassified discovery produced to date except for a copy of the defendant's server, which requires a very large storage device for reproduction. The Government and defense counsel are working toward a solution for reproduction of the server.

Second, the Government confirms that it has produced an electronic copy of all classified discovery in this case. To the extent the defendant seeks unredacted copies of the classified discovery, the Government objects to that request for the reasons stated during the February 5 conference and in the Government's filing pursuant to Section 4 of the Classified Information Procedures Act, dated December 10, 2018.

Respectfully submitted,

GEOFFREY S. BERMAN
 United States Attorney

By: _____ /s/

Sidhardha Kamaraju / Matthew Laroche
 Assistant United States Attorneys
 Scott McCulloch
 Special Assistant United States Attorney

Cc: Defense Counsel (via ECF)